



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES HARVEY SCOTT, JR.,  
ANTHONY FIELDS, JR., and  
JAYCEE SIMPSON,

Defendants.

CR No. 5:24-cr-00055-WLH

I N D I C T M E N T

[18 U.S.C. § 1344(2): Bank Fraud;  
18 U.S.C. § 982: Criminal  
Forfeiture]

The Grand Jury charges:

COUNTS ONE THROUGH TWENTY-ONE

[18 U.S.C. § 1344(2)]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Bank of America, N.A., JPMorgan Chase Bank, N.A. ("Chase"),  
U.S. Bank, N.A., and Wells Fargo Bank, N.A. were each a financial  
institution insured by the Federal Deposit Insurance Corporation.

2. An arrow key or a modified arrow lock (MAL) key was a type  
of universal key used by the United States Postal Service to access

1 collection boxes, outdoor parcel lockers, cluster box units, and  
2 apartment panels.

3 3. Defendant ANTHONY FIELDS, JR. was the registered agent of  
4 "West Paramount Consultants" and was a registered officer of "First  
5 Pick Trucking LLC DBA First Pick Trucking."

6 4. Fix Auto Redlands was an auto body repair and collision  
7 repair shop. Allison Mechanical, Inc. was a heating, ventilation, and  
8 air conditioning business. Other than sharing the same community  
9 mailbox in Redlands, California, these businesses were not  
10 affiliated.

11 B. THE SCHEME TO DEFRAUD

12 5. Beginning no later than in or around February 2022 and  
13 continuing until at least in or around May 2023, in San Bernardino  
14 and Riverside Counties, within the Central District of California,  
15 and elsewhere, defendants JAMES HARVEY SCOTT, JR., ANTHONY FIELDS,  
16 JR., and JAYCEE SIMPSON, and others known and unknown to the Grand  
17 Jury, knowingly and with intent to defraud, devised, participated in,  
18 and executed a scheme to obtain moneys, funds, credits, assets, and  
19 other property owned by and in the custody and control of federally  
20 insured financial institutions by means of material false and  
21 fraudulent pretenses, representations, and promises, and the  
22 concealment of material facts.

23 6. The fraudulent scheme operated, and was carried out, in  
24 substance, in the following manner:

25 a. Defendant SCOTT, either alone or together with others  
26 known and unknown to the Grand Jury, would access and steal mail  
27 belonging to various individuals and businesses, including checks  
28 payable to Fix Auto Redlands and Allison Mechanical, Inc., by using a

1 real or counterfeit arrow key or MAL key.

2 b. Defendant SCOTT would give defendant FIELDS stolen  
3 checks payable to Fix Auto Redlands and Allison Mechanical, Inc.

4 c. Defendant FIELDS opened various bank accounts,  
5 including an account with Wells Fargo under the name "West Paramount  
6 Consultants," an account with Wells Fargo under his own name, and an  
7 account with Chase under the name "First Pick Trucking LLC DBA First  
8 Pick Trucking," and used these accounts to deposit stolen proceeds in  
9 the form of a cashier's check and altered, modified, or "washed"  
10 checks and money orders, and would make subsequent withdrawals from  
11 these accounts for his benefit. In so doing, defendant FIELDS falsely  
12 represented to Wells Fargo and Chase that he was authorized to  
13 receive the stolen proceeds.

14 d. Defendant FIELDS gave defendant SIMPSON the stolen  
15 checks payable to Fix Auto Redlands or Allison Mechanical, Inc.

16 e. Defendant SIMPSON opened a bank account with Bank of  
17 America under the name "Fix Auto Redlands LLC dba Allison Mechanical  
18 Inc." In doing so, defendant SIMPSON falsely represented to the  
19 financial institution that operated the bank account that he was an  
20 authorized business representative of Fix Auto Redlands and Allison  
21 Mechanical, Inc.

22 f. Defendant SIMPSON would deposit checks stolen from Fix  
23 Auto Redlands and Allison Mechanical, Inc. In doing so, defendant  
24 SIMPSON falsely represented to the financial institution that  
25 operated the bank account that he was authorized to deposit the  
26 checks and make subsequent withdrawals and concealed that he was not  
27 authorized to deposit the checks or make subsequent withdrawals.

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g. Defendant SIMPSON, either directly or indirectly, would pay defendant FIELDS and defendant SCOTT a portion of the funds received from the fraudulent scheme.

C. EXECUTIONS OF THE FRAUDULENT SCHEME

7. On or about the following dates, in San Bernardino and Riverside Counties, within the Central District of California, and elsewhere, defendants SCOTT, FIELDS, and SIMPSON, aiding and abetting each other, committed the following acts, each of which constituted an execution of the fraudulent scheme:

| COUNT | DEFENDANT | DATE              | ACT   |
|-------|-----------|-------------------|---|
| ONE   | FIELDS    | February 28, 2022 | Defendant FIELDS deposited nine stolen money orders totaling \$2,954 at a Chase ATM in Redlands, California.  |
| TWO   | FIELDS    | March 28, 2022    | Defendant FIELDS deposited a stolen money order for \$255 at a Chase ATM in Loma Linda, California.   |
| THREE | SIMPSON   | March 28, 2023    | Defendant SIMPSON opened a bank account with Bank of America under the name "Fix Auto Redlands LLC dba Allison Mechanical Inc" in Loma Linda, California.   |
| FOUR  | SIMPSON   | April 4, 2023     | Defendant SIMPSON deposited nine stolen checks totaling \$72,831.64, four of which were payable to Fix Auto Redlands LLC and five of which were payable Allison Mechanical, Inc., at a Bank of America ATM in San Bernardino, California. |

| COUNT  | DEFENDANT | DATE          | ACT  |
|--------|-----------|---------------|--|
| FIVE   | SIMPSON   | April 5, 2023 | Defendant SIMPSON obtained a \$22,000 cashier's check in stolen proceeds payable to West Paramount Consultants from a bank teller at a Bank of America in Highland, California.                                |
| SIX    | SIMPSON   | April 5, 2023 | Defendant SIMPSON obtained a \$22,000 cashier's check in stolen proceeds payable to Co-Schemer 1 from a bank teller at a Bank of America in Highland, California.  |
| SEVEN  | SIMPSON   | April 5, 2023 | Defendant SIMPSON withdrew \$6,000 in stolen proceeds from a bank teller at a Bank of America in Highland, California.   |
| EIGHT  | SIMPSON   | April 5, 2023 | Defendant SIMPSON withdrew \$1,000 in stolen proceeds from a Bank of America ATM in Highland, California.  |
| NINE   | FIELDS    | April 5, 2023 | Defendant FIELDS deposited a cashier's check for \$22,000 in stolen proceeds payable to West Paramount Consultants (which defendant SIMPSON had previously obtained) at a Wells Fargo in Redlands, California. |
| TEN    | SIMPSON   | April 6, 2023 | Defendant SIMPSON withdrew \$6,000 in stolen proceeds from a bank teller at a Bank of America in San Bernardino, California.   |
| ELEVEN | SIMPSON   | April 7, 2023 | Defendant SIMPSON withdrew \$6,000 in stolen proceeds from a bank teller at a Bank of America in San Bernardino, California.   |

| COUNT     | DEFENDANT | DATE           | ACT   |
|-----------|-----------|----------------|---|
| TWELVE    | SCOTT     | April 10, 2023 | Defendant SCOTT caused Co-Schemer 1 to deposit in her name and account a cashier's check for \$22,000 in stolen proceeds payable to Co-Schemer 1 (which defendant SIMPSON had previously obtained) at a Bank of America in Fontana, California. |
| THIRTEEN  | SCOTT     | April 21, 2023 | Defendant SCOTT caused Co-Schemer 1 to withdraw \$10,000 cash in stolen proceeds from a bank teller at a Bank of America in Loma Linda, California.   |
| FOURTEEN  | SIMPSON   | April 29, 2023 | Defendant SIMPSON deposited nine stolen checks totaling \$72,083.22 payable to Allison Mechanical, Inc. at a Bank of America ATM in San Bernardino, California.   |
| FIFTEEN   | SIMPSON   | May 2, 2023    | Defendant SIMPSON deposited a stolen check payable to Fix Auto Collision and victim J.L. for \$7,769.99 at a Bank of America ATM in Highland, California.   |
| SIXTEEN   | SIMPSON   | May 5, 2023    | Defendant SIMPSON withdrew \$9,000 in stolen proceeds from a Bank of America in San Bernardino, California.   |
| SEVENTEEN | SIMPSON   | May 8, 2023    | Defendant SIMPSON withdrew \$9,500 in stolen proceeds from a bank teller at a Bank of America in Victorville, California.   |
| EIGHTEEN  | SIMPSON   | May 8, 2023    | Defendant SIMPSON withdrew \$9,000 in stolen proceeds from a Bank of America ATM in Victorville, California.  |

| COUNT      | DEFENDANT | DATE            | ACT   |
|------------|-----------|-----------------|---|
| NINETEEN   | SIMPSON   | May 10,<br>2023 | Defendant SIMPSON withdrew \$1,500 in stolen proceeds from a Bank of America ATM in Apple Valley, California.     |
| TWENTY     | FIELDS    | May 10,<br>2023 | Defendant FIELDS deposited two stolen money orders totaling \$1,620 at a U.S. Bank ATM in Loma Linda, California. |
| TWENTY-ONE | FIELDS    | May 11,<br>2023 | Defendant FIELDS deposited three stolen money orders for \$1,512.50 at a U.S. Bank ATM in Redlands, California.   |

FORFEITURE ALLEGATION

[18 U.S.C. § 982]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(2), in the event of the defendants' conviction of the offenses set forth in any of Counts One through Twenty-One of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), the defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has

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1 been substantially diminished in value; or (e) has been commingled  
2 with other property that cannot be divided without difficulty.

3  
4 A TRUE BILL

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6 /s/  
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Foreperson

8 E. MARTIN ESTRADA  
9 United States Attorney

10 MACK E. JENKINS  
11 Assistant United States Attorney  
12 Chief, Criminal Division



13 SCOTT M. GARRINGER  
14 Assistant United States Attorney  
15 Deputy Chief, Criminal Division

16 BENEDETTO L. BALDING  
17 Assistant United States Attorney  
18 Chief, General Crimes Section

19 J'ME K. FORREST  
20 Assistant United States Attorney  
21 General Crimes Section  
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